

IN THE DISTRICT COURT OF VIRGIN ISLANDS
DIVISION OF ST. CROIX

RUTH MILLER AND GAYLEN SWINGEN,)
)
Plaintiffs,)
)
v.) Civil Action No. 1:19-CV-49
)
AARP SERVICES, INC., AARP, INC., AARP)
OF THE VIRGIN ISLANDS, INC., GRUPO)
COOPERATIVE SEGUROS MULTIPLES,)
COOPERATIVE DE SEGUROS MULTIPLES)
OF PUERTO RICO, OVERSEAS INSURANCE)
AGENCY, INC., SEDGWICK CLAIMS)
MANAGEMENT SERVICES, INC.,)
VERICLAIM, INC., and BYRON GILCHREST,)
)
Defendants.)

)

NOTICE OF INABILITY
TO REACH AGREEMENT REGARDING
THE AARP DEFENDANTS' REQUEST FOR A PROTECTIVE ORDER

COMES NOW Plaintiffs, RUTH MILLER and GAYLEN SWINGEN, by and through their undersigned attorney, and give notice to this Honorable Court of the inability of the parties to reach an agreement regarding the AARP Defendants' request for a Protective Order. The parties conferred virtually regarding the proposed Protective Order on April 11, 2023, and have been communicated almost daily via email regarding various proposed language changes to the Protective Order. While agreement as to some issues was achieved, the parties could not reach agreement regarding the submission of Highly Confidential information and documents to consultants and experts.

The AARP Defendant's last proposed version of the Protective Order is attached as Exhibit A. Plaintiffs' last proposed version of the Protective Order is attached as Exhibit B.

The Adjuster Defendants have no objection to either the plaintiffs' proposed order or the AARP Defendants' proposed order.

LAW OFFICES OF PAMELA LYNN COLON, LLC
Attorney for Plaintiffs

DATED: April 18, 2023

/s/ Pamela Lynn Colon, Esquire
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